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DANIEL PALMIERI
RETIRED NYS SUPREME COURT
JUSTICE

OF COUNSEL
ROBERT KLUGMAN

April 9, 2020

Via ECF

Hon. Victor Marrero
United States District Judge
USDC - SDNY
500 Pearl Street
Suite 1610
New York, New York 10007

Re: *West Coast Business Capital, LLC v. Horizon Personnel Services Inc., et al.*
Case No. 20-CV-700 (VM)

To Judge Victor Marrero,

We represent Defendants/Counterclaim Plaintiffs Horizon Personnel Services Inc. d/b/a Horizon Personnel Services, Staffchex Inc. d/b/a Staffchex, Staffchex Management Group, Inc. d/b/a Staffchex Management Group and Charlene Anne Garza (collectively, “Defendants”) in the above-referenced action.

As you know, these are extraordinarily difficult times and, as a small law firm, we are facing extreme obstacles not being able to access our office and having to work remotely from home. Particularly, we do not have access to any of our normal resources that we rely upon to perform much of our work. In light of this, we write to respectfully request, *inter alia*, an additional extension of time for Defendants to file their Amended Answer and Counterclaims. We have conferred with counsel for Plaintiff/Counterclaim Defendant West Coast Business Capital, LLC (“Plaintiff”) and Counterclaim Defendant Tsvi H. Davis (“Davis”) who are agreeable to such an extension and we have collectively agreed to the following new briefing schedule:

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- Defendants to file Amended Answer with Counterclaims by May 26, 2020;
- Plaintiff and Davis to answer, move or respond to the Amended Answer with Counterclaims by June 30, 2020;
- Opposition to any motions to be filed by July 30, 2020; and
- Reply briefs, if any, by August 25, 2020.

We respectfully request that the Court approve the above briefing schedule. We are hopeful that by the end of May this situation will be behind us and we will be able to have returned to business as usual. Thank you.

Respectfully,

/s/ Jerome Reisman

Jerome Reisman

JC/lg/219802

cc: Counsel for all appearing parties (via ECF)